

Message

From: Williams, Jonathan R. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E099C65734B44D97BBB040607C615812-WILLIAMS, J]
Sent: 7/10/2019 12:05:57 PM
To: Zinn, Nicole [Zinn.Nicole@epa.gov]
Subject: RE: NRDC new comment on the clothianidin and thiamethoxam docket
Attachments: EPA-HQ-OPP-2012-0329-0060.pdf; NRDC Comment.pdf

Nicole,

Meg handed this comment to me at the beginning of June and said that it was a comment they'd gotten awhile ago. Though received it in hard copy, after the close of the comment period, they posted it to the dockets and I should too. You and I had a brief talk about it (very brief, so I would not expect you to recall) and we decided to post it to the docket, though we were well beyond accepting comments. I scanned it and I did so. Anthia was not happy about it, but it looks like it was finally posted on June 26th.

Going to the docket itself, you cannot download the comment. I think that during our original conversation about it, you mentioned that, because it had excerpts from published or unpublished literature, the comment itself could not be posted and that those interested in viewing it would have to contact us directly. The docket ID is EPA-HQ-OPP-2012-0329-0060. I have attached both the version from FDMS (EPA-HQ-OPP-2012-0329-0060.pdf) and my scan of the hard copy (NRDC Comment.pdf). I'm not really sure what to do from here. It occurs to me that this has to be beamed to EFED for an RtC, but only just now. I'm also not sure how this all fits into the email chain below.

Best,
Jon

From: Zinn, Nicole
Sent: Wednesday, July 10, 2019 7:45 AM
To: Williams, Jonathan R. <williams.jonathanr@epa.gov>
Subject: FW: NRDC new comment on the clothianidin and thiamethoxam docket

Hi Jon,

This is the first time I'm seeing this comment. Have you seen this comment before?

Thanks,
Nicole

From: Hathaway, Margaret
Sent: Tuesday, July 09, 2019 2:54 PM
To: Friedman, Dana <Friedman.Dana@epa.gov>
Cc: Jones, Ricardo <Jones.Ricardo@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Williams, Jonathan R. <williams.jonathanr@epa.gov>; Zinn, Nicole <Zinn.Nicole@epa.gov>
Subject: NRDC new comment on the clothianidin and thiamethoxam docket

Hello Dana:

As an FYI, here is a copy of the main comment (there are also many attachments) submitted by NRDC that Bayer is asking us about today. I pulled this copy from FDMS. The comment references all four nitroguanidine neonics as well as acetamiprid.

Jon and Nicole, could you please check if this NRDC comment has appeared in acetamiprid's docket too? It seems to be a unique circumstance where the comment contains copyrighted material, and is therefore announced as submitted to EPA but not publicly viewable. Also, please note that we are being instructed not to share information about the comment with outside stakeholders (such as registrants) at this time, due to the copyrighted nature of its contents.

Thank you,
Meg

Margaret Hathaway (Meg)
Chemical Review Manager
U.S. Environmental Protection Agency
OCSPP: Office of Pesticide Programs
Pesticide Re-Evaluation Division RMIB I
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(703) 305-5076

From: Hathaway, Margaret
Sent: Tuesday, July 09, 2019 2:40 PM
To: 'Lisa Bowers' <lisa.bowers@bayer.com>; Snyderman, Steven <Snyderman.Steven@epa.gov>
Cc: George Sabbagh <george.sabbagh@bayer.com>; Jones, Ricardo <Jones.Ricardo@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: new comment on the clothianidin and thiamethoxam docket

Hello Lisa:

Thank you for confirming via the provided links which comments you are referring to. Because my office is still reviewing the comments internally, we can't share additional information about them at this time. If you are interested in obtaining a copy now with redactions, please contact the EPA Docket Center.

Best regards,
Meg

Margaret Hathaway (Meg)
Chemical Review Manager
U.S. Environmental Protection Agency
OCSPP: Office of Pesticide Programs
Pesticide Re-Evaluation Division RMIB I
hathaway.margaret@epa.gov
(703) 305-5076

From: Lisa Bowers <lisa.bowers@bayer.com>
Sent: Tuesday, July 09, 2019 12:29 PM
To: Snyderman, Steven <Snyderman.Steven@epa.gov>
Cc: George Sabbagh <george.sabbagh@bayer.com>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>; Jones, Ricardo <Jones.Ricardo@epa.gov>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: RE: new comment on the clothianidin and thiamethoxam docket

Hi Steven,

Thanks for taking my call, today. I had a question about the new comment posted to the Dinotefuran, Clothianidin and Thiamethoxam docket. The title is similar on all three dockets: "Comment submitted by Lucas J. Rhoads, Staff Attorney, Nature Program on behalf of the Natural Resources Defense Council (NRDC). Date posted July 8, 2019. Public submission received by EPA on April 1, 2019."

The links on regulations.gov will take you to the new comment:

<https://www.regulations.gov/document?D=EPA-HQ-OPP-2011-0581-0351>

<https://www.regulations.gov/document?D=EPA-HQ-OPP-2011-0865-1155>

<https://www.regulations.gov/document?D=EPA-HQ-OPP-2011-0920-0756>

The Dinotefuran details indicate that the NRDC comment is authored by Kathryn L Klarich et al. I was wondering if the comment relates to her Jan 2019 publication:

<https://pubs.acs.org/doi/abs/10.1021/acs.estlett.8b00706>

• **Chlorinated Byproducts of Neonicotinoids and Their Metabolites: An Unrecognized Human Exposure Potential?**

Kathryn L. Klarich Wong, Danielle T. Webb, Matthew R. Nagorzanski, Dana W. Kolpin, Michelle L. Hladik, David M. Cwiertny, and Gregory H. LeFevre
Environmental Science & Technology Letters **2019** 6 (2), 98-105
DOI: 10.1021/acs.estlett.8b00706

Best regards,

Lisa

Lisa M. Bowers
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From: Snyderman, Steven <Snyderman.Steven@epa.gov>

Sent: Tuesday, July 9, 2019 8:54 AM

To: Lisa Bowers <lisa.bowers@bayer.com>

Cc: George Sabbagh <george.sabbagh@bayer.com>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>

Subject: RE: new comment on the clothianidin and thiamethoxam docket

Can you send me the regulations.gov link where you tried to access the comment? I'm also looping in Meg Hathaway who is the CRM for clothi and thia who might have an electronic copy on hand once we confirm it's already in the docket.

Steven Snyderman, Chemical Review Manager
Risk Management and Implementation Branch I
Pesticide Re-evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
Snyderman.Steven@epa.gov

(703) 347-0249

From: Lisa Bowers <lisa.bowers@bayer.com>
Sent: Tuesday, July 09, 2019 8:52 AM
To: Snyderman, Steven <Snyderman.Steven@epa.gov>
Cc: George Sabbagh <george.sabbagh@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
Subject: new comment on the clothianidin and thiamethoxam docket

Hi Steven,

Is there a chance you could send me the document: "Comment submitted by Lucas J. Rhoads, Staff Attorney, Nature Program on behalf of the Natural Resources Defense Council (NRDC)" posted July 8, 2019? There is an error on the clothianidin and the thiamethoxam site when I try to open the attachment.

Freundliche Grüße / Best regards,

Lisa Bowers

Senior Federal Regulatory Manager
Registrations



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